

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

TERRAFORM LABS PTE. LTD. *et al.*,

Debtors.¹

Chapter 11

Case No. 24-10070 (BLS)

**ORDER GRANTING APPLICATION OF WHITE & CASE LLP
FOR PAYMENT OF FEES AND EXPENSES AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Upon the application (the “**Application**”)² of White & Case LLP (“**White & Case**”) for entry of an order (the “**Order**”) authorizing, approving, and requiring the payment of the fees, costs, and expenses of White & Case as former counsel to the Official Committee of Unsecured Creditors; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Application having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in the Application (the “**Hearing**”); and upon consideration of the record of the Hearing, if any, and all proceedings had before the Court; and the Court having considered the Application, and after due deliberation thereon; and good sufficient cause appearing thereof;

¹ The Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Debtors’ principal offices are located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

² Capitalized terms used but not defined herein shall have the meanings given to them in the Application.

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED** as set forth herein.
2. White & Case is granted an administrative expense claim under sections 503(b)(3)(D) and 503(b)(4) of the Bankruptcy Code in the amount of \$430,973.52 for \$428,881.00 of professional fees and \$2,092.52 of expenses incurred as former counsel to the Committee, which claim shall be afforded priority under section 507(a)(2) of the Bankruptcy Code.
3. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2024
Wilmington, Delaware

THE HONORABLE BRENDAN L. SHANNON
UNITED STATES BANKRUPTCY JUDGE